

HEATHER E. WILLIAMS, SBN 122664
Federal Defender
CHRISTINA SINHA, SBN 278893
Assistant Federal Defender
Designated Counsel for Service
801 I Street, Third Floor
Sacramento, CA 95814
T: (916) 498-5700
F: (916) 498-5710

Attorneys for Defendant
GARY STEPHEN MAYNARD

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:21-CR-224-TLN
Plaintiff,)
vs.) STIPULATION AND ORDER TO CONTINUE
) STATUS CONFERENCE AND EXCLUDE TIME
GARY STEPHEN MAYNARD,) Date: June 2, 2022
Defendant.) Time: 9:30 a.m.
) Judge: Hon. Troy L. Nunley

IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney Phillip A. Talbert, through Assistant United States Attorney Michael Anderson, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Christina Sinha, counsel for Dr. Maynard, that the status conference may be **continued to July 28, 2022 at 9:30 a.m. with an exclusion of time.**

The parties specifically stipulate as follows:

1. By previous order, this matter was set for a status on June 02, 2022.
2. By stipulation, the defense now moves to continue the status conference to July 28, 2022, with time between June 02, 2022 and July 28, 2022 excluded.
3. The discovery in this case includes over 10,000 pages of reports and other documents; it also includes electronic data, such as video recordings.
4. The expert review of the complex data involved is ongoing, and the defense team

1 continues to confer with their experts as their analysis continues. Defense counsel
2 represents that they requires additional time to: continue reviewing the discovery;
3 investigate and research possible defenses; research potential pretrial motions;
4 continue consulting with their experts; explore potential resolutions to the case;
5 and otherwise prepare for trial.

6 5. Defense counsel believes that failure to grant the requested continuance would
7 deny them the reasonable time necessary for effective preparation, taking into
8 account the exercise of due diligence.

9 6. The government does not object to the continuance.

10 7. Therefore, the parties stipulate that the ends of justice served by granting the
11 continuance outweighs the best interest of the public and Dr. Maynard in a speedy
12 trial, and request the Court so to find.

13 8. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial
14 Act), the parties request that the time period between June 02, 2022 and July 28,
15 2022, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv)
16 (Local Code T4), because it would result from a continuance granted by the Court
17 at the defense's request, based on a finding that the ends of justice served by
18 granting the continuance outweighs the best interest of the public and Dr.
19 Maynard in a speedy trial.

20 *(Remainder of page intentionally left blank. Signatures to follow.)*
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: May 31, 2022

/s/ Christina Sinha
CHRISTINA SINHA
Assistant Federal Defender
Attorneys for Defendant
GARY STEPHEN MAYNARD

Date: May 31, 2022

PHILLIP A. TALBERT
United States Attorney

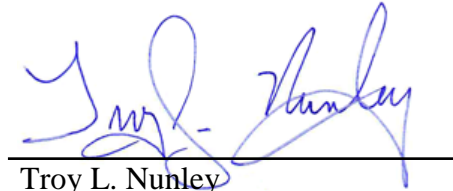
/s/ Michael Anderson
MICHAEL ANDERSON
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: June 1, 2022


Troy L. Nunley
United States District Judge